



PARDALIS & NOHAVICKA, LLP
ATTORNEYS

November 20, 2024

VIA ECF

Honorable Michael E. Farbiarz
United States District Judge
United States District Court,
District of New Jersey
Martin Luther King Building & U.S.Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Adyar Ananda Bhavan, Corp. v. Heaven Spice USA LLC et al.*
Civil Case No.: **2:19-cv-16879-JMV-JSA**

Dear Respected District Judge Farbiarz:

We represent Plaintiff Adyar Ananda Bhavan, Corp. and respectfully write with respect to Your Honor's Order dated November 13, 2024, directing Plaintiff to file a reply brief by November 20, 2024, or risk dismissal for failure to prosecute. (ECF No. 130),

Consistent with Your Honor's Order dated September 26, 2024 (ECF No. 125), Plaintiff timely submitted its reply brief in further support of its Motion for Summary Judgment on November 8, 2024, via the Court's ECF Help Desk. Confirmation of receipt was received, as attached hereto as **Exhibit 1**.

Due to technical issues with the undersigned's ECF account, filings have been submitted through the Court's ECF Help Desk. On November 13, 2024, my associate, Eleni Melekou, Esq., admitted pro hac vice, followed up with the ECF Help Desk via electronic mail to inquire about the filing and docketing status of the reply brief. Once again, confirmation was received that the documents were properly submitted and would be docketed based on the date of their receipt. Consistent with those assurances, the Clerk of the Court docketed the Plaintiff's reply brief and associated documents, with an effective filing date of November 8, 2024, assigned ECF Doc. 131.

We respectfully submit that the Plaintiff timely submitted its reply papers to the Court and Defendants' counsel, and that the delay in docketing was solely the result of technical difficulties encountered with my ECF account.

We appreciate Your Honor's understanding and are available to address any further questions or concerns. We thank Your Honor for Your time and consideration to this matter.

Respectfully submitted,

PARDALIS & NOHAVICKA, LLP

By: /s/Anastasi Pardalis
Anastasi Pardalis, Esq.

cc (Via ECF):

Clerk of the Court
Francis Xavier Nolan, IV, Esq.

EXHIBIT 1



Eleni Melekou <eleni@pnlawyers.com>

2:19-cv-16879-JMV-JSA ADYAR ANANDA BHAVAN, CORP. v. HEAVEN SPICE USA LLC et al. - Plaintiff's Reply in Support of Motion for Summary Judgment

4 messages

Eleni Melekou <Eleni@pnlawyers.com>

Fri, Nov 8, 2024 at 2:35 PM

To: NJD-HelpDesk <ecfhelp@njd.uscourts.gov>

Cc: "Nolan, Frank" <franknolan@eversheds-sutherland.com>, Taso Pardalis <taso@pnlawyers.com>, Joseph Nohavicka <jdn@pnlawyers.com>, Todd Sherman <greg@pnlawyers.com>, Samantha Karaisaridis <Samantha@pnlawyers.com>, Destiny Figueroa <billing@pnlawyers.com>, "Bakhsh, Umar" <umarbakhsh@eversheds-sutherland.com>, NJD-HelpDesk <ecfhelp@njd.uscourts.gov>

Bcc: 8bff7d8df+matter1508235516@maildrop.clio.com

To the Honorable Court,

This office represents Plaintiff in the above-captioned action. Partner Anastasi Pardalis is admitted to practice before this Honorable Court (NJ ID #:357512021). The undersigned is admitted *pro hac vice* by Order of Honorable Judge Jessica S. Allen, U.S.M.J. dated January 18, 2023 (Doc. No. 93). I respectfully request the filing of the attached documents on Mr. Pardalis' behalf as he is the lead attorney of the record.

We respectfully request your assistance in filing the attached Plaintiff's Reply in Support of its Motion for Summary Judgment under Mr. Pardalis ECF account with this court.

By Order of Hon. Michael E. Farbiarz, U.S.D.J. dated September 26, 2024 (Doc. No. 125), Plaintiff's due date to file its Reply in Support of Motion for Summary Judgment is November 8, 2024.

When we tried to file the attached documents earlier today through Mr. Pardalis ECF account with this Honorable Court, we encountered a technical error and the page of the civil events appeared to be blank.

The previous time we experienced the same technical error, the undersigned called the ECF Help Desk. The clerk was accommodating and helpful and advised we could file via electronic email to ecfhelp@njd.uscourts.gov.

Please let us know if you need additional information from us.

Thank you.

Respectfully,

Eleni

**PARDALIS &
NOHAVICKA**
ATTORNEYS

Eleni Melekou
Attorney

O. 212-213-8511

E. Eleni@pnlawyers.com

A. 950 Third Avenue, 11th Fl.
New York, NY 10022













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10 attachments

-  **AABNY v. AABSS - Plaintiff's Response to Defendants' CounterStatement of Material Facts.pdf**
140K
-  **AABNY v. AABSS - Plaintiff's Reply in Support of MSJ..pdf**
680K
-  **Exhibit 28 - Defendants' Website using Plaintiff's mark.pdf**
393K
-  **Exhibit 27 - TTAB decision dated July 25, 2023.pdf**
161K
-  **Exhibit 29 - A2B website information.pdf**
206K
-  **Exhibit 30 - AABSS India - Peitition for Cancellation Plaintiff's trademark registration.pdf**
921K
-  **Exhibit 31 - Plaintiff's Motion to Dismiss Cancellation Proceedings before TTAB.pdf**
3052K
-  **Exhibit 32- A2B MENU 110824.pdf**
7036K
-  **Exhibit 33 - Indian Mark Registration Information in India.pdf**
257K
-  **AABNY v. AABSS - Transmittal Declaration of Anastasi Pardalis, Esq..pdf**
229K

NJD-HelpDesk <ecfhelp@njd.uscourts.gov>
To: Eleni Melekou <Eleni@pnlawyers.com>

Fri, Nov 8, 2024 at 2:38 PM

Good Afternoon,

Your submission has been forwarded to the appropriate staff for processing.

Regards,

ECF Help Desk

From: Eleni Melekou <Eleni@pnlawyers.com>

Sent: Friday, November 8, 2024 2:35 PM

To: NJD-HelpDesk <ecfhelp@njd.uscourts.gov>

Cc: Nolan, Frank <franknolan@eversheds-sutherland.com>; Taso Pardalis <taso@pnlawyers.com>; Joseph Nohavicka <jdn@pnlawyers.com>; Todd Sherman <greg@pnlawyers.com>; Samantha Karaisaridis <Samantha@pnlawyers.com>; Destiny Figueroa <billing@pnlawyers.com>; Bakhsh, Umar <umarbakhsh@eversheds-sutherland.com>

Subject: 2:19-cv-16879-JMV-JSA ADYAR ANANDA BHAVAN, CORP. v. HEAVEN SPICE USA LLC et al. - Plaintiff's Reply in Support of Motion for Summary Judgment

CAUTION - EXTERNAL:

[Quoted text hidden]

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

Eleni Melekou <Eleni@pnlawyers.com>

Wed, Nov 13, 2024 at 1:11 PM

To: NJD-HelpDesk <ecfhelp@njd.uscourts.gov>

Cc: "Nolan, Frank" <franknolan@eversheds-sutherland.com>, "Bakhsh, Umar" <umarbakhsh@eversheds-sutherland.com>, Taso Pardalis <taso@pnlawyers.com>, Joseph Nohavicka <jdn@pnlawyers.com>, Todd Sherman <Todd@pnlawyers.com>

Bcc: 8bff7d8df+matter1508235516@maildrop.clio.com

To the Honorable Court,

I hope this message finds you well. I am writing concerning Plaintiff's reply in further support of its motion for summary judgment, along with the accompanying exhibits, which were due on November 8, 2024. I received confirmation on that date that the documents were received and forwarded to the appropriate staff for processing; however, they have not yet appeared on the docket.

If possible, may I respectfully request your assistance with ensuring these documents are filed? I am mindful of the filing deadline and want to make certain that everything is properly reflected in the docket.

Thank you very much for your time and attention to this matter.

Respectfully,

Eleni Melekou

**PARDALIS &
NOHAVICKA**
ATTORNEYS

Eleni Melekou
Attorney

O. 212-213-8511

E. Eleni@pnlawyers.com

A. 950 Third Avenue, 11th Fl.
New York, NY 10022



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NJD-HelpDesk <ecfhelp@njd.uscourts.gov>
To: Eleni Melekou <Eleni@pnlawyers.com>

Wed, Nov 13, 2024 at 4:51 PM

Good afternoon,

I can confirm that your submission has been received and forwarded for processing. It will be docketed as of the date you submitted it.

Best Regards,

USDC Help Desk

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